

STATE OF VERMONT  
PUBLIC SERVICE BOARD

Petition of Vermont Gas Systems, Inc. for a )  
certificate of public good, pursuant to 30 V.S.A. )  
§ 248, authorizing the construction of the )  
“Addison Natural Gas Project” consisting of )  
approximately 43 miles of new natural gas )  
transmission pipeline in Chittenden and )  
Addison Counties, approximately 5 miles of )  
new distribution mainlines in Addison County, )  
together with three new gate stations in )  
Williston, New Haven and Middlebury, )  
Vermont )

Docket No. 7970

REPLY BRIEF OF DAVID CARSE AND ELIZABETH HAZEN

Intervenors, David Carse (“Carse”) and Elizabeth Hazen (“Hazen”), by their attorneys,  
Gravel & Shea PC, submit the following reply brief in the above captioned matter.

Carse and Hazen were granted intervenor status by the Board on April 12, 2013. *See*  
Order Re: Motions to Intervene, Docket No. 7970, dated 4/12/2013. To date, Carse and Hazen  
have monitored the proceedings in this docket, though they have selected not to submit  
testimony or evidence of their own in the proceeding, and take no position as to whether or not  
the Public Service Board should issue Vermont Gas Systems, Inc. (“VGS”) a certificate of public  
good in connection with the proposed Addison Natural Gas Project (the “Project”). Instead,  
Carse and Hazen would like to submit these short comments in support of co-locating the  
Project’s pipeline within existing or expanded Vermont Electric Power Company, Inc./Vermont

Transco LLC (“VELCO”) right of way generally, and on the Carse and Hazen properties in Hinesburg specifically.<sup>1</sup>

The Hinesburg Selectboard supports the Project, but has requested that the pipeline be re-routed to the existing VELCO corridor. *See* Proposed Decision Submitted On Behalf Of Vermont Gas Systems, Inc. at ¶ 167 (citing Wark 12/2012 pf. at 15; Wark 2/28/13 pf. at 3-4; exh. Pet. SJW-4.14). VELCO supports co-locating the Project’s easement and pipeline in VELCO’s right of way (with some exceptions, including Rotax Road in Monkton). Brief of the Vermont Electric Power Company, Inc. at 5. VELCO notes that cooperative utility co-location efforts limits impacts to landowners and protects expansion capabilities. *Id.* at 6. Additionally, the Department of Public Service has stated that “co-location is, in principle, a desirable way to site new transmission facilities (both gas and electric)” and recognizes that VGS continues to consider possible changes to the Project’s route to run in or adjacent to the existing VELCO right of way. Initial Brief of the Vermont Department of Public Service, at 4. The Department recommends, therefore, that VGS continue to negotiate with landowners and submit a detailed map with the final proposed route in an expedited post-CPG review of alternative routes. *Id.* at 5.

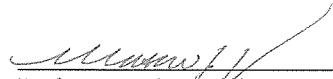
Carse and Hazen support the above-stated positions of the Hinesburg Selectboard, VELCO, and the Department, and ask that VGS, and the Board, consider and encourage the co-

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<sup>1</sup> David Carse and Elizabeth Hazen own property at 1230, 2356, 2594 and 2598 Charlotte Road and SPAN 294-093-12256 on Baldwin Road, in Hinesburg, Vermont.

location of the Project's pipeline within or adjacent to the existing or expanded VELCO right of way.

Dated: Burlington, Vermont  
October 25, 2013



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